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 CLERK US DISTRICT COURT
 DISTRICT OF ARIZONA

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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

1. Julian Canastillo,
(Counts 1-29, 45-48, 50)
2. Daniel Canastillo-Molina,
(Counts 1-7, 45-48)
3. Omar Trujillo, Jr.,
(Counts 1, 7-21)
4. Carlos Martinez,
(Counts 1, 8-10)
5. Nicolas Meraz,
(Counts 1, 22-29)
6. Timothy Scott Waltermire, Jr.,
(Counts 1-6, 30-44, 49)
7. Tylor Cody Joiner,
(Counts 30-34)
8. Roy Glen Cline III,
(Counts 35-44)
9. Corey Creasia,
(Counts 45-48)

No. CR22-1857-TUC-JCH-BGM

**SUPERSEDING
 INDICTMENT**

VIO: 18 U.S.C. § 2(a)
 (Aiding and Abetting the
 Commission of an Offense)
 Counts 8-48

18 U.S.C. § 371
 (Conspiracy)
 Count 1

18 U.S.C. § 554(a)
 (Smuggling Goods from the United
 States)
 Counts 2-7

18 U.S.C. §§ 922(a)(6) & 924(a)(2)
 (Making False Statements in
 Connection with Acquisition of
 Firearms)
 Counts 8-48

18 U.S.C. §§ 922(a)(1)(A) &
 924(a)(1)(D)
 (Engaging in the Business of
 Dealing Firearms Without a
 License)
 Count 49

10. Diego Rey Gonzalez,
Count 51)

Defendants.

18 U.S.C. §§ 922(g)(1) & 924(a)(2)
(Possession of a Firearm by a
Convicted Felon)
Count 50

18 U.S.C. §§ 922(d)(1) & 924(a)(2)
(Sale of Firearms to a Convicted
Felon)
Count 51

18 U.S.C. § 924(d); 28 U.S.C. §
2461(c); 50 U.S.C. § 4819(d)(1)(B)
Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

From on or about October of 2021 and May of 2022, in the District of Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, OMAR TRUJILLO, JR., CARLOS MARTINEZ, NICOLAS MERAZ, and TIMOTHY SCOTT WALTERMIRE, JR., did knowingly and intentionally combine, conspire, confederate, and agree together and with persons known and unknown to the grand jury, to commit offenses against the United States, that is: to knowingly export and send from the United States, and attempt to export and send from the United States, any merchandise, article, or object, contrary to any law or regulation of the United States, and to receive, conceal, buy, sell, and in any manner facilitate the transportation, concealment, and sale of such merchandise, article or object, knowing the same to be intended for exportation contrary to any law or regulation of the United States; in violation of Title 18, United States Code, Section 554(a); Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

Purpose of the Conspiracy

The purpose of this conspiracy was to commit, and assist in the commission of, the unlawful smuggling of firearms from the United States into the Republic of Mexico. The firearms smuggled in the course of this conspiracy include:

- Glock 17 9mm pistol
- 4 Glock 17Gen5 9mm pistols
- Glock 17Gen4 9mm pistol

- 4 Glock 19 9mm pistols
- 3 Glock 19X 9mm pistols
- 3 Glock 45 9mm pistols
- 3 FN M249S 5.56x45mm rifles
- FN SCAR17S 7.62x51mm rifle
- 2 Ohio Ordnance Works M240SLR .308 rifles
- Kalashnikov USA KR103 7.62x39mm rifle
- Century Arms BFT47 7.62x39mm rifle
- 5 Century Arms VSKA 7.62x39mm rifles
- 4 Pioneer Arms Hellpup 7.62x39mm pistols
- Pioneer Arms Sporter 7.62x39mm rifle
- Zastava ZPAP M70 7.62x39mm rifle
- 25 Palmetto State Armory PSAK47 7.62x39mm rifles
- 41 Palmetto State Armory PA-15 multi-caliber receivers
- 2 Romarm/CUGIR Micro Draco 7.62x39mm pistols
- Colt Carbine 5.56x45mm rifle
- 2 Colt M4 Carbine 5.56x45mm rifles
- Smith & Wesson M&P15 5.56x45mm rifle
- 2 Keltec PMR30 .22 pistols
- 7 FMK Firearms 9C1 Gen 2 9mm pistols
- 2 Masterpiece Arms MPA30T 9mm pistols
- 3 TISAS Zigana PX-9 9mm pistols
- Wise Lite Arms RPD 7.62x39mm rifle
- Barrett 82A1. 50BMG rifle
- Century Arms Draco 7.62x39mm pistol

The Means and Methods of the Conspiracy

The means and methods employed by the defendants and their co-conspirators to carry out the conspiracy and effect its unlawful objects are as follows:

It was part of the conspiracy that certain defendants and/or their co-conspirators would purchase and acquire firearms within the District of Arizona.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would provide the funds and directions for the firearm purchases to the defendants and/or co-conspirators who purchased the firearms and provide monetary compensation for the firearm purchases.

1 It was a further part of the conspiracy that certain defendants and/or their co-
2 conspirators would transfer the firearms purchased to other defendants and/or co-
3 conspirators within the District of Arizona.

4 It was a further part of the conspiracy that the defendants and/or their co-
5 conspirators would purchase and transfer the firearms with the knowledge that the firearms
6 were intended to ultimately be transported from the United States into the Republic of
7 Mexico.

8 It was a further part of the conspiracy that certain defendants and/or their co-
9 conspirators would transport the firearms from the United States into the Republic of
10 Mexico.

11 It was a further part of the conspiracy that the defendants and/or their co-
12 conspirators did not have any valid license or other authority to export the firearms from
13 the United States into the Republic of Mexico.

14 **Overt Acts**

15 In furtherance of the conspiracy, one or more of the co-conspirators committed,
16 or caused to be committed, the overt acts described below:

17 On or about December 14, 2021, an individual purchased eight Palmetto State
18 Armory PA-15 multi-caliber receivers and a Palmetto State Armory PSAK47 7.62x39mm
19 rifle from a federally licensed firearms dealer in the District of Arizona. DANIEL
20 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
21 the directions and funds to purchase the firearms. JULIAN CANASTILLO then provided
22 TIMOTHY SCOTT WALTERMIRE, JR., with the directions and funds to purchase the
23 firearms, and TIMOTHY SCOTT WALTERMIRE, JR., provided these directions and
24 funds to the individual who purchased the firearms. The individual transferred the firearms
25 to TIMOTHY SCOTT WALTERMIRE, JR., after he acquired them, who then transferred
26 the firearms to JULIAN CANASTILLO. JULIAN CANASTILLO or another co-
27 conspirator transported the firearms from Arizona to the Republic of Mexico on behalf of
28 DANIEL CANASTILLO-MOLINA.

1 On or about December 28, 2021, an individual purchased four Palmetto State
2 Armory PSAK47 7.62x39mm rifles, five Palmetto State Armory PA-15 multi-caliber
3 receivers, four FMK Firearms 9C1 Gen 2 9mm pistols, and a Pioneer Arms Hellpup
4 7.62x39mm pistol from a federally licensed firearms dealer in the District of Arizona.
5 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
6 CANASTILLO the directions and funds to purchase the firearms. JULIAN
7 CANASTILLO then provided TIMOTHY SCOTT WALTERMIRE, JR., with the
8 directions and funds to purchase the firearms, and TIMOTHY SCOTT WALTERMIRE,
9 JR., provided these directions and funds to the individual who purchased the firearms. The
10 individual transferred the firearms to TIMOTHY SCOTT WALTERMIRE, JR., after he
11 acquired them, who then transferred the firearms to JULIAN CANASTILLO. JULIAN
12 CANASTILLO or another co-conspirator transported the firearms from Arizona to the
13 Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA. On or about March
14 1, 2022, four of the Palmetto State Armory PSAK47 7.62x39mm rifles, all four FMK
15 Firearms 9C1 Gen 2 9mm pistols, and the Pioneer Arms Hellpup 7.62x39mm pistol were
16 recovered in the Republic of Mexico.

17 On or about December 30, 2021, an individual purchased a Pioneer Arms
18 Hellpup 7.62x39mm pistol from a federally licensed firearms dealer in the District of
19 Arizona. DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
20 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
21 then provided TIMOTHY SCOTT WALTERMIRE, JR., with the directions and funds to
22 purchase the firearm, and TIMOTHY SCOTT WALTERMIRE, JR., provided these
23 directions and funds to the individual who purchased the firearm. The individual
24 transferred the firearm to TIMOTHY SCOTT WALTERMIRE, JR., after he acquired it,
25 who then transferred the firearm to JULIAN CANASTILLO. JULIAN CANASTILLO or
26 another co-conspirator transported the firearm from Arizona to the Republic of Mexico on
27 behalf of DANIEL CANASTILLO-MOLINA. On or about March 1, 2022, the Pioneer
28 Arms Hellpup 7.62x39mm pistol was recovered in the Republic of Mexico.

1 On or about January 12, 2022, an individual purchased six Palmetto State
2 Armory PSAK47 7.62x39mm rifles and three FMK Firearms 9C1 Gen 2 9mm pistols from
3 a federally licensed firearms dealer in the District of Arizona. DANIEL CANASTILLO-
4 MOLINA or another co-conspirator provided JULIAN CANASTILLO the directions and
5 funds to purchase the firearms. JULIAN CANASTILLO then provided TIMOTHY
6 SCOTT WALTERMIRE, JR., with the directions and funds to purchase the firearms, and
7 TIMOTHY SCOTT WALTERMIRE, JR., provided these directions and funds to the
8 individual who purchased the firearms. The individual transferred the firearms to
9 TIMOTHY SCOTT WALTERMIRE, JR., after he acquired them, who then transferred the
10 firearms to JULIAN CANASTILLO. JULIAN CANASTILLO or another co-conspirator
11 transported the firearms from Arizona to the Republic of Mexico on behalf of DANIEL
12 CANASTILLO-MOLINA. On or about March 1, 2022, five of the Palmetto State Armory
13 PSAK47 7.62x39mm rifles and one of the FMK Firearms 9C1 Gen 2 9mm pistols were
14 recovered in the Republic of Mexico.

15 On or about January 18, 2022, NICHOLAS MERAZ purchased a Glock
16 17Gen5 9mm pistol, a Glock 19X 9mm pistol, and a Glock 45 9mm pistol from a federally
17 licensed firearms dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or
18 another co-conspirator provided JULIAN CANASTILLO the directions and funds to
19 purchase the firearms. JULIAN CANASTILLO then provided NICHOLAS MERAZ with
20 the directions and funds to purchase the firearms, and NICHOLAS MERAZ transferred the
21 firearms to JULIAN CANASTILLO or another co-conspirator after he acquired them.
22 JULIAN CANASTILLO or another co-conspirator transported the firearms from Arizona
23 to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

24 On or about January 19, 2022, an individual purchased three Palmetto State
25 Armory PSAK47 7.62x39mm rifles, two Masterpiece Arms MPA30T 9mm pistols, a
26 TISAS Zigana PX-9 9mm pistol, and eight Palmetto State Armory PA-15 multi-caliber
27 receivers from a federally licensed firearms dealer in the District of Arizona. DANIEL
28 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO

1 the directions and funds to purchase the firearms. JULIAN CANASTILLO then provided
2 TIMOTHY SCOTT WALTERMIRE, JR., with the directions and funds to purchase the
3 firearms, and TIMOTHY SCOTT WALTERMIRE, JR., provided these directions and
4 funds to the individual who purchased the firearms. The individual transferred the firearms
5 to TIMOTHY SCOTT WALTERMIRE, JR., after he acquired them, who then transferred
6 the firearms to JULIAN CANASTILLO. JULIAN CANASTILLO or another co-
7 conspirator transported the firearms from Arizona to the Republic of Mexico on behalf of
8 DANIEL CANASTILLO-MOLINA. On or about August 10, 2022, one of the Palmetto
9 State Armory PA-15 multi-caliber receivers was recovered in the Republic of Mexico.

10 On or about January 24, 2022, OMAR TRUJILLO, JR., purchased a Glock
11 17Gen5 9mm pistol and a Kalashnikov USA KR103 7.62x39mm rifle from a federally
12 licensed firearms dealer in the District of Arizona. Also on January 24, 2022, NICHOLAS
13 MERAZ purchased a Romarm/CUGIR Micro Draco 7.62x39mm pistol and a Colt M4
14 Carbine 5.56x45mm rifle from a federally licensed firearms dealer in the District of
15 Arizona. DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
16 CANASTILLO the directions and funds to purchase the firearms. JULIAN
17 CANASTILLO then provided OMAR TRUJILLO, JR., and NICHOLAS MERAZ each
18 with the directions and funds to purchase the firearms, and OMAR TRUJILLO, JR., and
19 NICHOLAS MERAZ each transferred the firearms he purchased to JULIAN
20 CANASTILLO or another co-conspirator after he acquired them. JULIAN
21 CANASTILLO or another co-conspirator transported the firearms from Arizona to the
22 Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

23 On or about January 28, 2022, an individual purchased ten Palmetto State
24 Armory PSAK47 7.62x39mm rifles, two TISAS Zigana PX-9 9mm pistols, and seven
25 Palmetto State Armory PA-15 multi-caliber receivers from a federally licensed firearms
26 dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or another co-
27 conspirator provided JULIAN CANASTILLO the directions and funds to purchase the
28 firearms. JULIAN CANASTILLO then provided TIMOTHY SCOTT WALTERMIRE,

1 JR., with the directions and funds to purchase the firearms, and TIMOTHY SCOTT
2 WALTERMIRE, JR., provided these directions and funds to the individual who purchased
3 the firearms. The individual transferred the firearms to TIMOTHY SCOTT
4 WALTERMIRE, JR., after he acquired them, who then transferred the firearms to JULIAN
5 CANASTILLO. JULIAN CANASTILLO or another co-conspirator transported the
6 firearms from Arizona to the Republic of Mexico on behalf of DANIEL CANASTILLO-
7 MOLINA. On or about September 9, 2022, one of the Palmetto State Armory PSAK47
8 7.62x39mm rifles was recovered in the Republic of Mexico.

9 On or about February 3, 2022, NICHOLAS MERAZ purchased a Glock
10 17Gen5 9mm pistol and a Colt M4 Carbine 5.56x45mm rifle from a federally licensed
11 firearms dealer in the District of Arizona, and a Century Arms VSKA 7.62x39mm rifle
12 from another federally licensed firearms dealer in the District of Arizona. DANIEL
13 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
14 the directions and funds to purchase the firearms. JULIAN CANASTILLO then provided
15 NICHOLAS MERAZ with the directions and funds to purchase the firearms, and
16 NICHOLAS MERAZ transferred the firearms to JULIAN CANASTILLO or another co-
17 conspirator after he acquired them. JULIAN CANASTILLO or another co-conspirator
18 transported the firearms from Arizona to the Republic of Mexico on behalf of DANIEL
19 CANASTILLO-MOLINA.

20 On or about February 7, 2022, an individual purchased three Glock 19 9mm
21 pistols and thirteen Palmetto State Armory PA-15 multi-caliber receivers from a federally
22 licensed firearms dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or
23 another co-conspirator provided JULIAN CANASTILLO the directions and funds to
24 purchase the firearms. JULIAN CANASTILLO then provided TIMOTHY SCOTT
25 WALTERMIRE, JR., with the directions and funds to purchase the firearms, and
26 TIMOTHY SCOTT WALTERMIRE, JR., provided these directions and funds to the
27 individual who purchased the firearms. The individual transferred the firearms to
28 TIMOTHY SCOTT WALTERMIRE, JR., after he acquired them, who then transferred the

1 firearms to JULIAN CANASTILLO. JULIAN CANASTILLO or another co-conspirator
2 transported the firearms from Arizona to the Republic of Mexico on behalf of DANIEL
3 CANASTILLO-MOLINA.

4 On or about March 10, 2022, OMAR TRUJILLO, JR., purchased a Glock 45
5 9mm pistol and a Century Arms BFT47 7.62x39mm rifle from a federally licensed firearms
6 dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or another co-
7 conspirator provided JULIAN CANASTILLO the directions and funds to purchase the
8 firearms. JULIAN CANASTILLO then provided OMAR TRUJILLO, JR., with the
9 directions and funds to purchase the firearm, and OMAR TRUJILLO, JR., transferred the
10 firearm to JULIAN CANASTILLO or another co-conspirator after he acquired it. JULIAN
11 CANASTILLO or another co-conspirator transported the firearm from Arizona to the
12 Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

13 On or about March 11, 2022, OMAR TRUJILLO, JR., purchased a Glock
14 17Gen4 9mm pistol from a federally licensed firearms dealer in the District of Arizona.
15 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
16 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
17 then provided OMAR TRUJILLO, JR., with the directions and funds to purchase the
18 firearm, and OMAR TRUJILLO, JR., transferred the firearm to JULIAN CANASTILLO
19 or another co-conspirator after he acquired it. JULIAN CANASTILLO or another co-
20 conspirator transported the firearm from Arizona to the Republic of Mexico on behalf of
21 DANIEL CANASTILLO-MOLINA.

22 On or about March 15, 2022, OMAR TRUJILLO, JR., purchased a Zastava
23 ZPAP M70 7.62x39mm rifle and a Pioneer Arms Hellpup 7.62x39mm pistol from a
24 federally licensed firearms dealer in the District of Arizona. DANIEL CANASTILLO-
25 MOLINA or another co-conspirator provided JULIAN CANASTILLO the directions and
26 funds to purchase the firearms. JULIAN CANASTILLO then provided OMAR
27 TRUJILLO, JR., with the directions and funds to purchase the firearms, and OMAR
28 TRUJILLO, JR., transferred the firearms to JULIAN CANASTILLO or another co-

1 conspirator after he acquired them. JULIAN CANASTILLO or another co-conspirator
2 transported the firearms from Arizona to the Republic of Mexico on behalf of DANIEL
3 CANASTILLO-MOLINA. On or about May 12, 2022, the Zastava ZPAP M70
4 7.62x39mm rifle was recovered in the Republic of Mexico.

5 On or about March 18, 2022, NICHOLAS MERAZ purchased a Glock 17Gen5
6 9mm pistol from a federally licensed firearms dealer in the District of Arizona. DANIEL
7 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
8 the directions and funds to purchase the firearm. JULIAN CANASTILLO then provided
9 NICHOLAS MERAZ with the directions and funds to purchase the firearm, and
10 NICHOLAS MERAZ transferred the firearm to JULIAN CANASTILLO or another co-
11 conspirator after he acquired it. JULIAN CANASTILLO or another co-conspirator
12 transported the firearm from Arizona to the Republic of Mexico on behalf of DANIEL
13 CANASTILLO-MOLINA.

14 On or about March 24, 2022, OMAR TRUJILLO, JR., purchased a Palmetto
15 State Armory PSAK47 7.62x39mm rifle and a Romarm/CUGIR Micro Draco 7.62x39mm
16 pistol from a federally licensed firearms dealer in the District of Arizona. DANIEL
17 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
18 the directions and funds to purchase the firearms. JULIAN CANASTILLO then provided
19 OMAR TRUJILLO, JR., with the directions and funds to purchase the firearms, and
20 OMAR TRUJILLO, JR., transferred the firearms to JULIAN CANASTILLO or another
21 co-conspirator after he acquired them. JULIAN CANASTILLO or another co-conspirator
22 transported the firearms from Arizona to the Republic of Mexico on behalf of DANIEL
23 CANASTILLO-MOLINA.

24 On or about March 25, 2022, OMAR TRUJILLO, JR., purchased a Century
25 Arms VSKA 7.62x39mm rifle from a federally licensed firearms dealer in the District of
26 Arizona. DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
27 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
28 then provided OMAR TRUJILLO, JR., with the directions and funds to purchase the

1 firearm, and OMAR TRUJILLO, JR., transferred the firearm to JULIAN CANASTILLO
2 or another co-conspirator after he acquired it. JULIAN CANASTILLO or another co-
3 conspirator transported the firearm from Arizona to the Republic of Mexico on behalf of
4 DANIEL CANASTILLO-MOLINA.

5 On or about March 30, 2022, OMAR TRUJILLO, JR., purchased a Colt Carbine
6 5.56x45mm rifle and a Century Arms VSKA 7.62x39mm rifle from a federally licensed
7 firearms dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or another
8 co-conspirator provided JULIAN CANASTILLO the directions and funds to purchase the
9 firearms. JULIAN CANASTILLO then provided OMAR TRUJILLO, JR., with the
10 directions and funds to purchase the firearms, and OMAR TRUJILLO, JR., transferred the
11 firearms to JULIAN CANASTILLO or another co-conspirator after he acquired them.
12 JULIAN CANASTILLO or another co-conspirator transported the firearms from Arizona
13 to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

14 On or about April 2, 2022, an individual purchased a Wise Lite Arms RPD
15 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona.
16 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
17 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
18 then provided the individual with the directions and funds to purchase the firearm, and the
19 individual transferred the firearm to JULIAN CANASTILLO or another co-conspirator
20 after he acquired it. JULIAN CANASTILLO or another co-conspirator transported the
21 firearm from Arizona to the Republic of Mexico on behalf of DANIEL CANASTILLO-
22 MOLINA.

23 On or about April 4, 2022, an individual purchased a Barrett 82A1. 50BMG
24 rifle from a federally licensed firearms dealer in the District of Arizona. DANIEL
25 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
26 the directions and funds to purchase the firearm. JULIAN CANASTILLO then provided
27 the individual with the directions and funds to purchase the firearm, and the individual
28 transferred the firearm to JULIAN CANASTILLO after he acquired it. JULIAN

1 CANASTILLO or another co-conspirator transported the firearm from Arizona to the
2 Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

3 On or about April 7, 2022, OMAR TRUJILLO, JR., purchased an FN M249S
4 5.56x45mm rifle from a federally licensed firearms dealer in the District of Arizona.
5 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
6 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
7 then provided OMAR TRUJILLO, JR., with the directions and funds to purchase the
8 firearm, and OMAR TRUJILLO, JR., transferred the firearm to JULIAN CANASTILLO
9 or another co-conspirator after he acquired it. JULIAN CANASTILLO or another co-
10 conspirator transported the firearm from Arizona to the Republic of Mexico on behalf of
11 DANIEL CANASTILLO-MOLINA.

12 On or about April 11, 2022, NICHOLAS MERAZ purchased an FN M249S
13 5.56x45mm rifle from a federally licensed firearms dealer in the District of Arizona. Also
14 on or about April 11, 2022, another individual purchased another FN M249S 5.56x45mm
15 rifle from a federally licensed firearms dealer in the District of Arizona. DANIEL
16 CANASTILLO-MOLINA or another co-conspirator provided JULIAN CANASTILLO
17 the directions and funds to purchase the firearms. JULIAN CANASTILLO then provided
18 NICHOLAS MERAZ and the other individual each with the directions and funds to
19 purchase the firearms, and NICHOLAS MERAZ and the other individual each transferred
20 the firearm he purchased to JULIAN CANASTILLO or another co-conspirator after he
21 acquired it. JULIAN CANASTILLO or another co-conspirator transported the firearms
22 from Arizona to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

23 On or about April 18, 2022, OMAR TRUJILLO, JR., purchased a Glock 19X
24 9mm pistol and two Century Arms VSKA 7.62x39mm rifles from a federally licensed
25 firearms dealer in the District of Arizona. DANIEL CANASTILLO-MOLINA or another
26 co-conspirator provided JULIAN CANASTILLO the directions and funds to purchase the
27 firearms. JULIAN CANASTILLO then provided OMAR TRUJILLO, JR., with the
28 directions and funds to purchase the firearms, and OMAR TRUJILLO, JR., transferred the

1 firearms to JULIAN CANASTILLO or another co-conspirator after he acquired them.
2 JULIAN CANASTILLO or another co-conspirator transported the firearms from Arizona
3 to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

4 On or about April 24, 2022, NICHOLAS MERAZ purchased a Glock 17 9mm
5 pistol and a Glock 45 9mm pistol from a federally licensed firearms dealer in the District
6 of Arizona. DANIEL CANASTILLO-MOLINA or another co-conspirator provided
7 JULIAN CANASTILLO the directions and funds to purchase the firearms. JULIAN
8 CANASTILLO then provided NICHOLAS MERAZ with the directions and funds to
9 purchase the firearms, and NICHOLAS MERAZ transferred the firearms to JULIAN
10 CANASTILLO or another co-conspirator after he acquired them. JULIAN
11 CANASTILLO or another co-conspirator transported the firearms from Arizona to the
12 Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

13 On or about April 28, 2022, CARLOS MARTINEZ purchased a Glock 19 9mm
14 pistol and an FN SCAR17S 7.62x51mm rifle from two separate federally licensed firearms
15 dealers in the District of Arizona. DANIEL CANASTILLO-MOLINA or another co-
16 conspirator provided JULIAN CANASTILLO the directions and funds to purchase the
17 firearms. JULIAN CANASTILLO then provided OMAR TRUJILLO, JR., with the
18 directions and funds to purchase the firearms, and OMAR TRUJILLO, JR., provided the
19 directions and funds to CARLOS MARTINEZ. CARLOS MARTINEZ transferred the
20 firearms to OMAR TRUJILLO, JR., after he acquired them, and OMAR TRUJILLO, JR.,
21 then transferred the firearms to JULIAN CANASTILLO or another co-conspirator.
22 JULIAN CANASTILLO or another co-conspirator transported the firearms from Arizona
23 to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

24 On or about April 30, 2022, OMAR TRUJILLO, JR., purchased a Glock 19X
25 9mm pistol, a Keltec PMR30 .22 pistol, and a Century Arms Draco 7.62x39mm pistol from
26 a federally licensed firearms dealer in the District of Arizona, and a Pioneer Arms Sporter
27 7.62x39mm rifle and a Smith & Wesson M&P15 5.56x45mm rifle from another federally
28 licensed firearms dealer in the District of Arizona. Also on or about April 30, 2022,

1 NICHOLAS MERAZ purchased a Pioneer Arms Hellpup 7.62x39mm pistol and a Keltec
2 PMR30 .22 pistol from a federally licensed firearms dealer in the District of Arizona.
3 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
4 CANASTILLO the directions and funds to purchase the firearms. JULIAN
5 CANASTILLO then provided OMAR TRUJILLO, JR., and NICHOLAS MERAZ each
6 with the directions and funds to purchase the firearms, and OMAR TRUJILLO, JR., and
7 NICHOLAS MERAZ each transferred the firearm he purchased to JULIAN
8 CANASTILLO or another co-conspirator after he acquired it. JULIAN CANASTILLO or
9 another co-conspirator transported the firearms from Arizona to the Republic of Mexico
10 on behalf of DANIEL CANASTILLO-MOLINA.

11 On or about May 2, 2022, CARLOS MARTINEZ purchased an Ohio Ordnance
12 Works M240SLR .308 rifle from a federally licensed firearms dealer in the District of
13 Arizona. DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
14 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
15 then provided OMAR TRUJILLO, JR., with the directions and funds to purchase the
16 firearm, and OMAR TRUJILLO, JR., provided the directions and funds to CARLOS
17 MARTINEZ. CARLOS MARTINEZ transferred the firearm to OMAR TRUJILLO, JR.,
18 after he acquired it. OMAR TRUJILLO, JR., intended to transfer the firearm to JULIAN
19 CANASTILLO or another co-conspirator, who would subsequently transport the firearm
20 from Arizona to the Republic of Mexico on behalf of DANIEL CANASTILLO-MOLINA.

21 On or about May 4, 2022, an individual purchased an Ohio Ordnance Works
22 M240SLR .308 rifle from a federally licensed firearms dealer in the District of Arizona.
23 DANIEL CANASTILLO-MOLINA or another co-conspirator provided JULIAN
24 CANASTILLO the directions and funds to purchase the firearm. JULIAN CANASTILLO
25 then provided the individual with the directions and funds to purchase the firearm, and the
26 individual transferred the firearm to JULIAN CANASTILLO or another co-conspirator
27 after he acquired it. JULIAN CANASTILLO or another co-conspirator transported the
28

1 firearm from Arizona to the Republic of Mexico on behalf of DANIEL CANASTILLO-
2 MOLINA.

3 All of the aforementioned firearms qualify as United States Commerce Control
4 List items, and therefore are prohibited by law for export from the United States into
5 Mexico without a valid license. None of the aforementioned defendants or their co-
6 conspirators had a license or any other lawful authority to export the firearms from the
7 United States into Mexico.

8 All in violation of Title 18, United States Code, Section 371.

9 **COUNT 2**

10 Between on or about December 28, 2021, and March 1, 2022, in the District of
11 Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and
12 TIMOTHY SCOTT WALTERMIRE, JR., knowingly and fraudulently exported and sent
13 from the United States any merchandise, article, or object contrary to any law or regulation
14 of the United States, and received, concealed, bought, sold, and in any manner facilitated
15 the transportation, concealment, and sale of such merchandise, article or object, that is:
16 four FMK Firearms 9C1 Gen 2 9mm pistols, four Palmetto State Armory PSAK47
17 7.62x39mm rifles, and a Pioneer Arms Hellpup 7.62x39mm pistol; knowing the same to
18 be intended for exportation contrary to any law or regulation of the United States, to wit:
19 Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations,
20 Parts 736.2, 738, and 774.

21 In violation of Title 18, United States Code, Section 554(a).

22 **COUNT 3**

23 Between on or about December 30, 2021, and March 1, 2022, in the District of
24 Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and
25 TIMOTHY SCOTT WALTERMIRE, JR., knowingly and fraudulently exported and sent
26 from the United States any merchandise, article, or object contrary to any law or regulation
27 of the United States, and received, concealed, bought, sold, and in any manner facilitated
28 the transportation, concealment, and sale of such merchandise, article or object, that is: a

1 Pioneer Arms Hellpup 7.62x39mm pistol; knowing the same to be intended for exportation
2 contrary to any law or regulation of the United States, to wit: Title 50, United States Code,
3 Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

4 In violation of Title 18, United States Code, Section 554(a).

5 **COUNT 4**

6 Between on or about January 12, 2022, and March 1, 2022, in the District of
7 Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and
8 TIMOTHY SCOTT WALTERMIRE, JR., knowingly and fraudulently exported and sent
9 from the United States any merchandise, article, or object contrary to any law or regulation
10 of the United States, and received, concealed, bought, sold, and in any manner facilitated
11 the transportation, concealment, and sale of such merchandise, article or object, that is: five
12 Palmetto State Armory PSAK47 7.62x39mm rifles and an FMK Firearms 9C1 Gen 2 9mm
13 pistol; knowing the same to be intended for exportation contrary to any law or regulation
14 of the United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code
15 of Federal Regulations, Parts 736.2, 738, and 774.

16 In violation of Title 18, United States Code, Section 554(a).

17 **COUNT 5**

18 Between on or about January 19, 2022, and August 10, 2022, in the District of
19 Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and
20 TIMOTHY SCOTT WALTERMIRE, JR., knowingly and fraudulently exported and sent
21 from the United States any merchandise, article, or object contrary to any law or regulation
22 of the United States, and received, concealed, bought, sold, and in any manner facilitated
23 the transportation, concealment, and sale of such merchandise, article or object, that is: a
24 Palmetto State Armory PA-15 multi caliber receiver; knowing the same to be intended for
25 exportation contrary to any law or regulation of the United States, to wit: Title 50, United
26 States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738,
27 and 774.

28 In violation of Title 18, United States Code, Section 554(a).

1 COUNT 6

2 Between on or about January 28, 2022, and September 9, 2022, in the District of
3 Arizona, Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and
4 TIMOTHY SCOTT WALTERMIRE, JR., knowingly and fraudulently exported and sent
5 from the United States any merchandise, article, or object contrary to any law or regulation
6 of the United States, and received, concealed, bought, sold, and in any manner facilitated
7 the transportation, concealment, and sale of such merchandise, article or object, that is: a
8 Palmetto State Armory PSAK47 7.62x39mm rifle; knowing the same to be intended for
9 exportation contrary to any law or regulation of the United States, to wit: Title 50, United
10 States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738,
11 and 774.

12 In violation of Title 18, United States Code, Section 554(a).

13 COUNT 7

14 Between on or about March 15, 2022, and May 12, 2022, in the District of Arizona,
15 Defendants JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, and OMAR
16 TRUJILLO, JR., knowingly and fraudulently exported and sent from the United States any
17 merchandise, article, or object contrary to any law or regulation of the United States, and
18 received, concealed, bought, sold, and in any manner facilitated the transportation,
19 concealment, and sale of such merchandise, article or object, that is: a Zastava ZPAP M70
20 7.62x39mm rifle; knowing the same to be intended for exportation contrary to any law or
21 regulation of the United States, to wit: Title 50, United States Code, Section 4819; and
22 Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

23 In violation of Title 18, United States Code, Section 554(a).

24 COUNTS 8 - 10

25 On or about the dates listed below, in the District of Arizona, Defendants CARLOS
26 MARTINEZ, OMAR TRUJILLO, JR., and JULIAN CANASTILLO knowingly made
27 false statements and representations in connection with the acquisition of firearms to the
28 businesses listed below, which were intended and likely to deceive the businesses as to a

fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant CARLOS MARTINEZ stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendants OMAR TRUJILLO, JR. and JULIAN CANASTILLO; and Defendants OMAR TRUJILLO, JR., and JULIAN CANASTILLO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

Count	Date	FFL	Firearms
8	04/28/2022	Liberty Pawn Shop	Glock 19 9mm pistol
9	04/28/2022	Turner's Outdoorsman	FN SCAR17S 7.62x51mm rifle
10	04/30/2022	Turner's Outdoorsman	Ohio Ordnance Works M240SLR .308 rifle

In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

COUNTS 11 - 21

On or about the dates listed below, in the District of Arizona, Defendants OMAR TRUJILLO, JR., and JULIAN CANASTILLO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant OMAR TRUJILLO, JR., stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant JULIAN CANASTILLO; and Defendant JULIAN CANASTILLO, aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

Count	Date	FFL	Firearms
11	01/24/2022	Turner's Outdoorsman	Glock 17Gen5 9mm pistol Kalashnikov USA KR103 7.62x39mm rifle
12	03/10/2022	Disruptive Tactical	Century Arms BFT47 7.62x39mm rifle Glock 45 9mm pistol
13	03/11/2022	Liberty Pawn Shop	Glock 17Gen4 9mm pistol
14	03/15/2022	SNG Tactical	Pioneer Arms Hellpup 7.62x39mm pistol Zastava ZPAP M70 7.62x39mm rifle
15	03/24/2022	CityWide Supply LLC	Palmetto State Armory PSAK47 7.62x39mm rifle Romarm/CUGIR Micro Draco 7.62x39mm pistol
16	03/25/2022	SNG Tactical	Century Arms VSKA 7.62x39mm rifle
17	03/30/2022	Liberty Pawn Shop	Century Arms VSKA 7.62x39mm rifle Colt Carbine 5.56x45mm rifle
18	04/07/2022	Turner's Outdoorsman	FN M249S 5.56x45mm rifle
19	04/18/2022	SNG Tactical	2 Century Arms VSKA 7.62x39mm rifles Glock 19X 9mm pistol
20	04/30/2022	Arizona Arms Sales LLC	Smith&Wesson M&P15 5.56x45mm rifle Pioneer Arms Sporter 7.62x39mm rifle
21	04/30/2022	Refiners Firearms LLC	Keltec PMR30 .22 pistol Glock 19X 9mm pistol Century Arms Draco 7.62x39mm pistol

In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

COUNTS 22 - 29

On or about the dates listed below, in the District of Arizona, Defendants NICOLAS MERAZ and JULIAN CANASTILLO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant NICOLAS MERAZ stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant JULIAN CANASTILLO; and Defendant

JULIAN CANASTILLO, aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

Count	Date	FFL	Firearms
22	01/18/2022	SNG Tactical	Glock 17Gen5 9mm pistol Glock 19X 9mm pistol Glock 45 9mm pistol
23	01/24/2022	Turner's Outdoorsman	Colt M4 Carbine 5.56x45mm rifle Romarm/CUGIR Micro Draco 7.62x39mm pistol
24	02/03/2022	Turner's Outdoorsman	Colt M4 Carbine 5.56x45mm rifle Glock 17Gen5 9mm pistol
25	02/03/2022	Disruptive Tactical	Century Arms VSKA 7.62x39mm rifle
26	03/18/2022	SNG Tactical	Glock 17Gen5 9mm pistol
27	04/11/2022	Turner's Outdoorsman	FN M249S 5.56x45mm rifle
28	04/24/2022	Arizona State Armory	Glock 45 9mm pistol Glock 17 9mm pistol
29	04/30/2022	Shootneup	Pioneer Arms Hellpup 7.62x39mm pistol Keltec PMR30 .22 pistol

In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

COUNTS 30 - 34

On or about the dates listed below, in the District of Arizona, Defendants TYLOR CODY JOINER and TIMOTHY SCOTT WALTERMIRE, JR., knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant TYLOR CODY JOINER stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant TIMOTHY SCOTT WALTERMIRE, JR.; and Defendant TIMOTHY SCOTT WALTERMIRE, JR., aided,

1 abetted, counseled, commanded, induced, and procured such false and fictitious
2 statements:

Count	Date	FFL	Firearms
30	12/28/2021	Catalina Pawn	4 FMK Firearms 9C1 Gen 2 9mm pistols Pioneer Arms Hellpup 7.62x39mm pistol 4 Palmetto State Armory PSAK47 7.62x39mm rifles 5 Palmetto State Armory PA-15 multi-caliber receivers
31	01/12/2022	Catalina Pawn	6 Palmetto State Armory PSAK47 7.62x39mm rifles 3 FMK Firearms 9C1 Gen 2 9mm pistols
32	01/19/2022	Catalina Pawn	2 Masterpiece Arms MPA30T 9mm pistols TISAS Zigana PX-9 9mm pistol 3 Palmetto State Armory PSAK47 7.62x39mm rifles 8 Palmetto State Armory PA-15 multi-caliber receivers
33	01/28/2022	Catalina Pawn	10 Palmetto State Armory PSAK47 7.62x39mm rifles 2 TISAS Zigana PX-9 9mm pistols 2 Nova Modul NAK9 9mm pistols 7 Palmetto State Armory PA-15 multi-caliber receivers
34	02/07/2022	Catalina Pawn	Taurus 856 .38 special revolver Sig Sauer P320 9mm pistol 3 Glock 19 9mm pistols 13 Palmetto State Armory PA-15 multi-caliber receivers

16 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

17 **COUNTS 35 - 44**

18 On or about the dates listed below, in the District of Arizona, Defendants ROY
19 GLEN CLINE III and TIMOTHY SCOTT WALTERMIRE, JR., knowingly made false
20 statements and representations in connection with the acquisition of firearms to the
21 businesses listed below, which were intended and likely to deceive the businesses as to a
22 fact material to the lawfulness of the sale of firearms by the business, each of which was
23 licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect
24 to information required by the provisions of Chapter 44 of Title 18, United States Code, to
25 be kept in the records of each listed business, in that Defendant ROY GLEN CLINE III
26 stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he
27 was knowingly acquiring the firearms on behalf of Defendant TIMOTHY SCOTT
28 WALTERMIRE, JR.; and Defendant TIMOTHY SCOTT WALTERMIRE, JR., aided,

1 abetted, counseled, commanded, induced, and procured such false and fictitious
2 statements:

Count	Date	FFL	Firearms
35	10/29/2021	Catalina Pawn	Ruger 22 Charger .22 pistol
			15 Palmetto State Armory PA-15 multi-caliber receivers
36	11/02/2021	Catalina Pawn	UMBE 1032 10 gauge shotgun
			7 Palmetto State Armory PA-15 multi-caliber receivers
37	11/22/2021	Catalina Pawn	4 Palmetto State Armory G3-lo multi-caliber receivers
38	11/30/2021	Catalina Pawn	Rockisland 206 .38 Special revolver
39	12/01/2021	Catalina Pawn	Henry Golden boy/NVM .22LR rifle Taurus 1911 .45ACP pistol
			10 Palmetto State Armory PA-15 multi-caliber receivers
40	12/02/2021	Catalina Pawn	2 Palmetto State Armory G3-lo multi-caliber receivers
			8 Palmetto State Armory PA15 multi-caliber receivers
41	12/14/2021	Catalina Pawn	Palmetto State Armory PSAK47 multi-caliber receiver
42	12/22/2021	Catalina Pawn	Ruger NM Blackhawk .357mag pistol
43	12/30/2021	Catalina Pawn	Pioneer Arms Hellpup 7.62x39mm pistol Ruger Mini-14 5.56x45mm rifle
44	01/20/2022	Catalina Pawn	Heritage Roughrider .22LR revolver

19 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

20 **COUNTS 45 - 48**

21 On or about the dates listed below, in the District of Arizona, Defendants COREY
22 CREASIA, JULIAN CANASTILLO, and DANIEL CANASTILLO-MOLINA knowingly
23 made false statements and representations in connection with the acquisition of firearms to
24 the businesses listed below, which were intended and likely to deceive the businesses as to
25 a fact material to the lawfulness of the sale of firearms by the business, each of which was
26 licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect
27 to information required by the provisions of Chapter 44 of Title 18, United States Code, to
28

be kept in the records of each listed business, in that Defendant COREY CREASIA stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendants JULIAN CANASTILLO and DANIEL CANASTILLO-MOLINA; and Defendants JULIAN CANASTILLO and DANIEL CANASTILLO-MOLINA aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

Count	Date	FFL	Firearms
45	04/02/2022	Murray's Firearms and Ammunition	Wise Lite Arms RPD 7.62x39mm rifle
46	04/04/2022	First Line of Defense	Barrett 82A1. 50BMG rifle
47	04/11/2022	Turner's Outdoorsman	FN M249S 5.56mm rifle
48	05/04/2022	First Line of Defense	Ohio Ordnance Works M240SLR .308 rifle

In violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

COUNT 49

Between on or about March of 2019 and on or about May of 2022, in the District of Arizona, Defendant TIMOTHY SCOTT WALTERMIRE, JR., not being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT 50

On or about April 5, 2022, in the District of Arizona, Defendant JULIAN CANASTILLO, knowingly having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Barrett model 82A1 .50 caliber rifle; said firearm being in and affecting commerce in that it was previously transported into the state of Arizona from another state or foreign country.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 51

On or about April 30, 2022, in the District of Arizona, Defendant DIEGO REY GONZALEZ did sell and otherwise dispose firearms, that is, two Pioneer Arms Sporter 7.62x39mm rifles, to Julian Canastillo, knowing and having reason to know that Julian Canastillo had been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

FORFEITURE ALLEGATION

Upon conviction of Counts One through Fifty-One of this Indictment, the defendants, JULIAN CANASTILLO, DANIEL CANASTILLO-MOLINA, OMAR TRUJILLO, JR., CARLOS MARTINEZ, NICOLAS MERAZ, TIMOTHY SCOTT WALTERMIRE, JR., TYLOR CODY JOINER, ROY GLEN CLINE III, COREY CREASIA, and DIEGO REY GONZALEZ, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offense, including, but not limited to:

Firearms/Receivers	Serial Number(s)
Glock 19, 9mm caliber Pistol	BDLN847
FN SCAR17S, 7.62 x51mm rifle	H1C14149
Ohio Ordnance Works M240SLR .380 rifle	240734
Glock 17 Gen 5 9mm pistol	BSWH415
Kalashnikov USA KR103 7.62x39mm rifle	K3R0004134
Century Arms BFT47 7.62x39mm rifle	BFT47001515
Glock 45 9mm pistol	BWDN786
Glock 17 Gen4 9mm pistol	BCPT812
Pioneer Arms Hellpup 7.62x39mm pistol	PAC1170143
Zastava ZPAP M70 7.62x39mm rifle	Z70-119924
Palmetto State Armory PSAK47 7.62x39mm rifle	AKB059605
Romarm/Cugir Micro Draco 7.62x39mm pistol	ROA22PMD-30087
Century Arms VSKA 7.62x39mm rifle	SV7P007535
Century Arms VSKA 7.62x39mm rifle	SV7107888

1	Colt Carbine 5.56x45mm rifle	CR082902
2	FN, M249S 5.56x45mm rifle	M249SA02406
3	Century Arms VSKA 7.62x39mm rifle	SV7113669
4	Century Arms VSKA 7.62x39mm rifle	SV7116793
5	Glock 19X 9mm pistol	BWSY473
6	Smith & Wesson M&P15 5.56x45mm rifle	TS89297
7	Pioneer Arms Sporter 7.62x39mm rifle	PAC169483
8	Keltec PMR30 .22 pistol	WYD412
9	Glock 19X 9mm pistol	BWG2430
10	Century Arms Draco 7.62x39mm pistol	SV7P008074
11	Glock 17Gen5 9mm pistol	BVGE302
12	Glock 19X 9mm pistol	BVHZ284
13	Glock 45 9mm pistol	BUEY467
14	Colt M4 Carbine 5.56x45mm rifle	CR802104
15	Romarm/Cugir Micro Draco 7.62x39mm pistol	Z1PMD-27128
16	Colt M4 Carbine 5.56x45mm rifle	CR714915
17	Glock 17Gen5 9mm pistol	ABPV835
18	Century Arms VSKA 7.62x39mm rifle	SV7072962
19	Glock 17Gen5 9mm pistol	BVSY452
20	FN M249S 5.56x45mm rifle	M249SA02328
21	Glock 45 9mm pistol	BWVL185
22	Glock 17 9mm pistol	ACYR898US
23	Pioneer Arms Hellpup 7.62x39mm pistol	APC1165015
24	Keltec PMR 30 .22 pistol	WY5Y61
25	(4) FMK Firearms 9C1 Gen 2 9mm pistols	SBD4910/ BD4911/ BTT3003/ BTT3033
26	Pioneer Arms Hellpup 7.62x39mm pistol	PAC1164226
27	(4) Palmetto State Armory PSAK47 7.62x39 rifles	AKB053785/ AKB054807/ AKB055009/ AKB055041
28	(5) Palmetto State Armory PA-15 multi-caliber receivers	SCB121760/ SCB121768/ SCD785523/ SCD785755/ SCD786172
	(6) Palmetto State Armory PSAK47 7.62x39mm rifles	AKB053830/ KB053559/ AKB054720/ KB053228/ AKB053828/ AKB053850
	(3) FMK Firearms 9C1 Gen 2 9mm pistols	SBD4900/ BGG6720/ BGG6717

1	(2) Masterpiece Arms MPA30T 9mm pistols	FX32141 / FX32140
2	Tisas Zigana PX-9 9mm pistol	T062021BM23325
3	(3) Palmetto State Armory PSAK47 7.62x 39mm rifles	AKB054060/ KB053171/ AKB054739
4	(8) Palmetto State Armory PA-15 multi-caliber receivers	SCB925657/ SCB927276/ SCB925633/ SCB927272/ SCB925674/ SCB927271/ SCB925654/ SCB925663
5		
6	(10) Palmetto State Armory PSAK47 7.62x39mm rifles	AKB060454/ KB059477/ AKB061021/ KB060446/ AKB054229/ KB059662/ AKB054261/ KB053106/ AKB053103/ AKB060444
7		
8		
9		
10	(2) TISAS Zigana PX-9 9mm pistols	T062021BM38760 T062021BM23554
11	(2) Nova Modul NAK9 9mm pistols	RON2163514/ RON2164097
12	(7) Palmetto State Armory PA-15 multi-caliber receivers	SCD311345/ SCD791165/ SCD311341/ SCB930554/ SCD789745/ SCB928131/ SCB928118
13		
14		
15	Taurus 856 .38 special revolver	ACM686864
16	Sig Sauer P320 9mm pistol	58K114125
17	(3) Glock 19, 9mm pistols	BVHB616 / BVHB615/ BVHB618
18	(13) Palmetto State Armory PA-15 multi-caliber receivers	SCB928199/ SCB928163/ SCB928183/ SCB931649/ SCB928124/ SCB928121/ SCB928122/ SCB928111/ SCB931650/ SCB391652/ SCB928169/ SCB931646/ SCB931651
19		
20		
21		
22	Ruger 22 Charger .22 pistol	492-17896
23	(15) Palmetto State Armory PA-15 multi-caliber receivers	SCD204077/ SCB912947/ SCB777364/ SCB912934/ SCD777916/ SCB119421/ SCD416742/ SCD416744/ SCD172068/ SCB912945/ SCB912940/ SCD416743/ SCD777917/ SCB119392/ SCB119427
24		
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1	UMBE 1032 10 gauge shotgun	7284
2	(7) Palmetto State Armory PA-15 multi-caliber receivers	SCD779091/ SCB917641/ SCB917629/ SCB917639/ SCB917620/ SCD779102/ SCD779084
3	(4) Palmetto State Armory G3-lo multi-caliber receivers	G347831/ G348111/ G348038/ G348108
4	Rockisland 206 .38 special pistol	RIA2212377
5	Henry Golden boy/NVM .22LR rifle	GB236133
6	Taurus 1911 .45ACP pistol	ACE946496
7	(10) Palmetto State Armory PA-15 multi-caliber receivers	SCD782430/ SCD782424/ SCD782422/ SCB18404/ SCD782419/ SCB918448/ SCB918434/ SCB918441/ SCD782439/ SCB918433
8	(2) Palmetto State Armory SA G3-lo multi-caliber receivers	G348795/ G348815
9	(8) Palmetto State Armory PA-15 multi-caliber receivers	SCB200358/ SCD209029/ SCB908730/ SCB200355/ SCD209027/ SCB908669/ SCB908670/ SCB920637
10	Palmetto State Armory PSAK47 multi-caliber receiver	AKB056739
11	Ruger NM Blackhawk .357 mag pistol	37-40502
12	Pioneer Arms Hellpup 7.62x39mm pistol	PAC1164619
13	Ruger Mini-14 5.56x45mm rifle	584-65462
14	Heritage Roughrider .22LR revolver	3PH046728
15	Wise Lite Arms RPD 7.62x39mm rifle	WLA212D00233
16	Barrett 82A1 .50BMG rifle	AA011543
17	FN M249S 5.56x45mm rifle	M2495A02402
18	Ohio Ordnance Works M240SLR .380 rifle	240690
19	Glock 17 9mm pistol	BTES667
20	Harrington and Richardson 904 .22 caliber Revolver	AY096261
21	Springfield Armory 1911 .45 caliber pistol	NM669217
22	Taurus TH9 9mm pistol	ACG023451
23	Taurus PT24/7 G2C 9mm pistol	NHS59845
24	Mossberg 500 12-gauge shotgun	T589736
25	Palmetto State Armory PA-15 multi-cal pistol	SCB936021
26	Ruger American .65 caliber rifle	690260986
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1	SCCY Industries CPX-1 9mm pistol	C156914
2	Umarex Sportwaffen GMBH&Co. R1 .22 caliber rifle	HA030679
3	Francolin Intl. Arms Citadel Boss-25 shotgun	21-49074
4	Palmetto State Armory PA-15 multi-caliber pistol	SCD301850
5	Sun City Machinery Co., LTD Stevens 320 12-gauge shotgun	201499T
6	Savage Arms Inc. 64 .22 caliber rifle	1816717
7	Marlin Firearms Co. 60 .22 caliber rifle	91496844
8	Savage Axis .380 caliber rifle	H320788
9	(2) Pioneer Arms Sporter 7.62x39mm rifles	PAC1171316/ PAC1171513

10 Upon conviction of Count One of the Indictment, the defendant, TIMOTHY
11 SCOTT WALTERMIRE, JR., shall forfeit to the United States pursuant to Title 50, United
12 States Code, Section 4819(d)(1)(B) and Title 28, United States Code, Section 2461(c), any
13 property constituting or traceable to the gross proceeds taken, obtained, or retained, in
14 connection with or as a result of the violation, including but not limited to: \$7,885.00 in
15 U.S. currency.

16 If any of the property described above, as a result of any act or omission of the
17 defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred
18 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of
19 the court; d) has been substantially diminished in value; or e) has been commingled with
20 other property which cannot be divided without difficulty, it is the intent of the United
21 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title
22 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said
23 defendants up to the value of the above forfeitable property, including, but not limited to,
24 all property, both real and personal, owned by the defendants.

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1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States
2 Code, Section 2461(c), Title 50, United States Code, Section 4819(d)(1)(B), and Rule
3 32.2(a), Federal Rules of Criminal Procedure.

4
5 A TRUE BILL

6
7 **/s/**
8 FOREPERSON OF THE GRAND JURY
Dated: September 15, 2022

9
10 GARY M. RESTAINO
United States Attorney
11 District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

12 **/s/**
13 ANGELA W. WOOLRIDGE
14 Assistant U.S. Attorney